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19	UNITED STATES	DISTRICT COURT
20	NORTHERN DISTR	ICT OF CALIFORNIA
21	OAKLAN	D DIVISION
22	EPIC GAMES, INC.	Case No. 4:20-cv-05640-YGR
23	2210 012122, 210	0.000 1.00 1.20 0. 000 10 1 011
23	Plaintiff, Counter-defendant	[PROPOSED] ORDER RE:
24	V.	COUNTERCLAIMANT APPLE INC.'S ADMINISTRATIVE MOTION TO SEAL
25	APPLE INC.,	ADMINISTRATIVE MOTION TO SEAL
		The Honorable Yvonne Gonzalez Rogers
26	Defendant, Counterclaimant	
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Pursuant to Civil Local Rule 79-5, Counterclaimant Apple Inc. ("Apple") has filed an Administrative Motion to Seal (the "Administrative Motion"). In support, Apple filed the accompanying declaration of Mark A. Perry.

Having considered the Administrative Motion, all associated declarations, exhibits, and any argument of counsel, and for good cause appearing:

IT IS HEREBY ORDERED that Counterclaimant's Administrative Motion is GRANTED.

Accordingly,

- (1) The un-redacted versions of the documents sought to be partially sealed by the Administrative Motion shall remain under seal;
- (2) The entire version of the documents sought to be fully sealed by the Administrative Motion shall remain under seal;
- (3) The public shall only have access to the versions of the partially sealed documents sought to be sealed by the Administrative Motion in which portions the following sections have been redacted:

<u>Category 1:</u> Apple's Request as to Information that Reflects its Competitively Sensitive Internal Billing Policies, Processes, and Systems

Portion of Document Sought	Document Title	Reason to Seal
to be Sealed		
21:24–22:14	Apple Inc.'s Motion For Entry	Reflects information
	Of Judgment On Its	regarding Apple's
	Indemnification Counterclaim	confidential, internal billing
	("Motion for Entry of	policies and procedures.
	Judgment")	
26:11–14	Motion for Entry of Judgment	Reflects information
		regarding Apple's
		confidential, internal billing
		policies and procedures.
26:20–22	Motion for Entry of Judgment	Reflects information
		regarding Apple's
		confidential, internal billing
		policies and procedures.
27:3–6	Motion for Entry of Judgment	Reflects information
		regarding Apple's
		confidential, internal billing
		policies and procedures.
1:23–3:15	Declaration of Mark Rollins in	Reflects information
	Support of Apple Inc.'s	regarding Apple's
	Motion for Entry of Judgment	confidential, internal billing

1		on its Indemnification	policies and procedures.
2		Counterclaim ("Rollins	
2		Declaration")	
3	3:17–18	Rollins Declaration	Reflects information
			regarding Apple's
4			confidential, internal billing
_		7 111 7 1	policies and procedures.
5	3:20–4:18	Rollins Declaration	Reflects information
6			regarding Apple's
-			confidential, internal billing
7	4:21–26	Rollins Declaration	policies and procedures. Reflects information
8	4.21–20	Rollins Declaration	
8			regarding Apple's confidential, internal billing
9			policies and procedures.
-	4:28–5:3	Rollins Declaration	Reflects information
10	7.20-3.3	Rollins Declaration	regarding Apple's
11			confidential, internal billing
11			policies and procedures.
12	5:9–13	Rollins Declaration	Reflects information
			regarding Apple's
13			confidential, internal billing
14			policies and procedures.
17	5:17	Rollins Declaration	Reflects information
15			regarding Apple's
4.5			confidential, internal billing
16			policies and procedures.
17	5:26	Rollins Declaration	Reflects information
1,			regarding Apple's
18			confidential, internal billing
10	C 10	D 11: D 1 4:	policies and procedures.
19	6:10	Rollins Declaration	Reflects information
20			regarding Apple's confidential, internal billing
			policies and procedures.
21	6:14–16	Rollins Declaration	Reflects information
22	0.14-10	Rollins Declaration	regarding Apple's
22			confidential, internal billing
23			policies and procedures.
	6:19–21	Rollins Declaration	Reflects information
24			regarding Apple's
25			confidential, internal billing
ا دے			policies and procedures.
26	6:24-7:1	Rollins Declaration	Reflects information
			regarding Apple's
27			confidential, internal billing
28			policies and procedures.
20	7:4–6	Rollins Declaration	Reflects information

1			regarding Apple's
2			confidential, internal billing
2			policies and procedures.
3	7:9–11	Rollins Declaration	Reflects information
			regarding Apple's
4			confidential, internal billing
5	7.15.16	Rollins Declaration	policies and procedures. Reflects information
5	7:15–16	Rollins Declaration	regarding Apple's
6			confidential, internal billing
_			policies and procedures.
7	7:20–21	Rollins Declaration	Reflects information
8	, , _ ,		regarding Apple's
			confidential, internal billing
9			policies and procedures.
10	7:24–26	Rollins Declaration	Reflects information
10			regarding Apple's
11			confidential, internal billing
10	0.0	D 11: D 1 ::	policies and procedures.
12	8:9	Rollins Declaration	Reflects information
13			regarding Apple's confidential, internal billing
			policies and procedures.
14	8:11–13	Rollins Declaration	Reflects information
15	0.11 13	resims Beclaration	regarding Apple's
10			confidential, internal billing
16			policies and procedures.
17	8:16–18	Rollins Declaration	Reflects information
1 /			regarding Apple's
18			confidential, internal billing
10	0.21.22	D 11: D 1 ::	policies and procedures.
19	8:21–23	Rollins Declaration	Reflects information
20			regarding Apple's confidential, internal billing
			policies and procedures.
21	8:26–28	Rollins Declaration	Reflects information
22			regarding Apple's
			confidential, internal billing
23			policies and procedures.
24	9:4–5	Rollins Declaration	Reflects information
۷4			regarding Apple's
25			confidential, internal billing
26	4.17	Declaration of Contact Land	policies and procedures.
26	4:17	Declaration of Carlyn Irwin in Support of Apple Inc.'s	Reflects information regarding Apple's
27		Motion for Entry of Judgment	confidential, internal billing
		on its Indemnification	policies and procedures.
28		Counterclaim ("Irwin	r
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	Declaration")	
6:13–14	Irwin Declaration	Reflects information regarding Apple's confidential, internal billing policies and procedures.
7:14	Irwin Declaration	Reflects information regarding Apple's confidential, internal billing policies and procedures.
7:25–8:3	Irwin Declaration	Reflects information regarding Apple's confidential, internal billing policies and procedures.
8:10	Irwin Declaration	Reflects information regarding Apple's confidential, internal billing policies and procedures.
8:13–16	Irwin Declaration	Reflects information regarding Apple's confidential, internal billing policies and procedures.
8:25–27	Irwin Declaration	Reflects information regarding Apple's confidential, internal billing policies and procedures.
Exhibit B, Footnotes 1–8	Irwin Declaration, Exhibit B	Reflects information regarding Apple's confidential, internal billing policies and procedures.
Exhibit C, Footnotes 1–8	Irwin Declaration, Exhibit C	Reflects information regarding Apple's confidential, internal billing policies and procedures.
Exhibit E	Irwin Declaration, Exhibit E	Reflects information regarding Apple's confidential, internal billing policies and procedures.
15:21	Declaration of Richard M. Pearl in Support of Apple Inc.'s Motion for Entry of Judgment on its Indemnification Counterclaim ("Pearl Declaration")	Reflects information regarding Apple's confidential, internal billing policies and procedures.
Exhibit A, final two bullets in "Other" section	Pearl Declaration, Exhibit A	Reflects information regarding Apple's confidential, internal billing policies and procedures.

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Portion of Document Sought	Document Title	Reason to Seal
to be Sealed		
3:3-4	Irwin Declaration	Reflects confidential rate information that is the subject of negotiations between Cornerstone Research and Apple.
Exhibit B, "Amount Billed (USD)," "Write Off Amount (USD)," "Net Total Amount Paid (USD)," and "Adjusted Total (USD)" Columns	Irwin Declaration, Exhibit B	Reflects confidential rate and other non-public information that is the subject of negotiations between Apple and its vendors.
Exhibit C, "Amount Billed (USD)," "Write Off Amount (USD)," "Net Total Amount Paid (USD)," and "Adjusted Total (USD)" Columns	Irwin Declaration, Exhibit C	Reflects confidential rate and other non-public information that is the subject of negotiations between Apple and its vendors.
7:8–10	Pearl Declaration	Reflects confidential rate information that is the subject of negotiations between Apple and its vendors.
7:12	Pearl Declaration	Reflects confidential rate information that is the subject of negotiations between Apple and its vendors.
8:9	Pearl Declaration	Reflects confidential rate information that is the subject of negotiations between Apple and its vendors.
8:22	Pearl Declaration	Reflects confidential rate information that is the subject of negotiations between Apple and Gibson, Dunn & Crutcher LLP, and Apple and Weil, Gotshal & Manges LLP.
9:2–3	Pearl Declaration	Reflects confidential rate information that is the subject of negotiations between Apple and Gibson, Dunn & Crutcher LLP, and Apple and Weil, Gotshal & Manges LLP.
9:7	Pearl Declaration	Reflects confidential rate information that is the subject of negotiations between Apple and Gibson, Dunn & Crutcher LLP.

<u>Category 3:</u> Apple's Request as to Information that Reflects Apple's Financial Information Relating to Costs Expended by Apple in the *Epic* Litigation

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Portion of Document Sought to be Sealed	Document Title	Reason to Seal	
Chart, 15:11–18	Motion for Entry of Judgment	Reflects non-public financial information regarding Apple's aggregate costs for the principal categories of its litigation expenses for the <i>Epic</i> litigation.	
6:9	Rollins Declaration	Reflects non-public financial information regarding Apple's aggregate costs for law firms for the <i>Epic</i> litigation.	
6:17	Rollins Declaration	Reflects non-public financial information regarding Apple's aggregate costs for Gibson, Dunn & Crutcher LLP for the <i>Epic</i> litigation.	
6:21	Rollins Declaration	Reflects non-public financial information regarding Apple's aggregate costs for Latham & Watkins LLP for the <i>Epic</i> litigation.	
7:2	Rollins Declaration	Reflects non-public financial information regarding Apple's aggregate costs for McDermott Will & Emery for the <i>Epic</i> litigation.	
7:7	Rollins Declaration	Reflects non-public financial information regarding Apple's aggregate costs for O'Melveny & Myers LLP for the <i>Epic</i> litigation.	
7:12	Rollins Declaration	Reflects non-public financial information regarding Apple's aggregate costs for Orrick, Herrington & Sutcliffe LLP for the <i>Epic</i> litigation.	
7:17	Rollins Declaration	Reflects non-public financial information regarding Apple's aggregate costs for Paul, Weiss, Rifkind, Wharton & Garrison LLP.	
7:22	Rollins Declaration	Reflects non-public financial information regarding Apple's aggregate costs for Skadden,	

		Arps, Slate, Meagher & Flon LLP for the <i>Epic</i> litigation.
7:27	Rollins Declaration	Reflects non-public financial information regarding Apple aggregate costs for Weil, Gotshal & Manges LLP for the <i>Epic</i> litigation.
8:8	Rollins Declaration	Reflects non-public financial information regarding Apple aggregate costs for its vendo for the <i>Epic</i> litigation.
8:14	Rollins Declaration	Reflects non-public financial information regarding Apple aggregate costs for Consilio Holdings for the <i>Epic</i> litigation.
8:19	Rollins Declaration	Reflects non-public financial information regarding Apple aggregate costs for Open Text Inc. for the <i>Epic</i> litigation.
8:24	Rollins Declaration	Reflects non-public financial information regarding Apple aggregate costs for Compass Lexecon for the <i>Epic</i> litigation.
9:1	Rollins Declaration	Reflects non-public financial information regarding Apple aggregate costs for Cornerstone Research for the <i>Epic</i> litigation.
Chart, 9:8–21	Rollins Declaration	Reflects non-public financial information regarding Apple aggregate costs for its litigation expenses in the <i>Ephlitigation</i> .
4:2	Irwin Declaration	Reflects non-public financial information regarding Apple aggregate costs for its litigation expenses in the <i>Eptlitigation</i> .
5:1–2	Irwin Declaration	Reflects non-public financial information regarding Apple aggregate costs for law firms for the <i>Epic</i> litigation.
Table 1, 5:4–17	Irwin Declaration	Reflects non-public financial information regarding Apple aggregate costs for law firms for the <i>Epic</i> litigation.

1	5:21–28	Irwin Declaration	Reflects non-public financial
2			information regarding Apple's aggregate costs for its
2			litigation expenses for the
3			Epic litigation.
4	8:27	Irwin Declaration	Reflects non-public financial information regarding Apple's
5			write-offs for the <i>Epic</i>
6			litigation.
	Table 2, 9:9–14	Irwin Declaration	Reflects non-public financial information regarding Apple's
7			aggregate costs for the
8			principal categories of its
9			litigation expenses for the <i>Epic</i> litigation.
10	15:8	Pearl Declaration	Reflects non-public
10			information regarding the
11			number of hours Apple's law firms spent on the <i>Epic</i>
12			litigation.
13	16:2	Pearl Declaration	Reflects non-public financial
			information regarding Apple's write-offs and billing
14			adjustments for the <i>Epic</i>
15			litigation.
16	20:5	Pearl Declaration	Reflects non-public financial information regarding Apple's
			aggregate costs for its
17			litigation expenses for the
18			Epic litigation.
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20	IT IS SO ORDERED.		
21	Dated:, 2024		
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The Honorable Yvonne Gonzalez Rogers United States District Court Judge